

FILED 29 APR '24 11:24 AM C-ORF

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Jesse Lee Hopkins

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:24-cv-00222-MO  
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

*AMENDED per Judge's  
Order's*

LT. ROUGHTON - FCI Sheridan

Jury Trial Demanded

WARDEN JACQUEZ - FCI Sheridan

☒ Yes

☐ No

ASSISTANT WARDEN BILLS - ET AL.,

(Enter full name of ALL defendant(s)) *20 Total Defendants*

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Jesse Lee Hopkins FCI Sheridan

Street Address: P.O. Box 5000

City, State & Zip Code: Sheridan, OR 97378

Telephone No.: \_\_\_\_\_

Defendant No. 1

Name: LT. ROUGHTON FCI SheridanStreet Address: P.O. Box 8000City, State & Zip Code: Sheridan Oregon 97378

Telephone No.: \_\_\_\_\_

Official  
capacity

Defendant No. 2

Name: WARDEN JACQUEZ FCI SheridanStreet Address: P.O. Box 8000City, State & Zip Code: Sheridan OR 97378

Telephone No.: \_\_\_\_\_

Official  
capacity

Defendant No. 3

Name: ASSISTANT WARDEN BILLS FCI SheridanStreet Address: P.O. Box 8000City, State & Zip Code: Sheridan OR 97378

Telephone No.: \_\_\_\_\_

Official  
capacity

Defendant No. 4

Name: SIS OFFICER PAPP FCI SheridanStreet Address: P.O. Box 8000City, State & Zip Code: Sheridan, OR 97378

Telephone No.: \_\_\_\_\_

Official  
capacity

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (check all that apply):

☒ Federal officials (a *Bivens* claim)

☐ State or local officials (a § 1983 claim)

Defendant No 5. GIS OFFICER THOMAS FEI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378  
Official  
capacity

Defendant No 6. CAPTAIN J. CERONE FEI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378  
Official  
capacity

Defendant No. 7. CORRECTION OFFICER T. SKELTON FEI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378  
Official  
capacity

Defendant No. 8. CASE MANAGER JOHNSON FEI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378  
Official  
capacity

Defendant No. 9. C/o Blanton FEI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378  
Official  
capacity



Defendant No. 10 c/o Huerta FET Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
Capacity

Defendant No. 11 c/o Winkler FET Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
Capacity

Defendant No. 12 c/o Polascio FET Sheridan  
P.O. Box 8000 Official  
Capacity  
Sheridan, OR  
97378

Defendant No. 13 c/o Vasquez FET Sheridan  
P.O. Box 8000 Official  
Capacity  
Sheridan, OR  
97378

Defendant No. 14 c/o Coyle FET Sheridan  
P.O. Box 8000 Official  
Capacity  
Sheridan, OR  
97378

Defendant No. 15 Dr. Ayala Rubio Nelson MD  
P.O. Box 8000  
Sheridan, OR 97378 FET Sheridan  
Official  
Capacity



Defendant No. 16 NURSE BURGMAW FCI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
capacity

Defendant No. 17 NURSE Heidt FCI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
capacity

Defendant No. 18 MEDICAL ADMINISTRATOR CARAZOSSA FCI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
capacity

Defendant 19 DR Crossley MD MEDICAL DIRECTOR FCI Sheridan  
P.O. Box 8000  
Sheridan OR 97378 Official  
capacity

Defendant 20 NURSE PARD FCI Sheridan  
P.O. Box 8000  
Sheridan, OR 97378 Official  
capacity







# All Defendants work at FCI Sheridan

## STATEMENT OF REASONS

Each Defendant is Acknowledged in claims over-  
served And how they fit into this Bivens's complaint  
what they did By NAME And how they violated my  
CONSTITUTIONAL rights.

Thank you

Jesse Lee Hopkins

[illegible]

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

MEDICAL NEGLIGENCE, DELIBERATE INDIFFERENCE, CRUEL & UNUSUAL PUNISHMENT, FAILURE TO PROTECT, DELAY IN MEDICAL TREATMENT, EQUAL PROTECTION CLAUSES AND DISCRIMINATION OF A Transgender PROPERTY LOSS. SEXUAL HARASSMENT.

### III. STATEMENT OF CLAIMS

#### Claim I

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

ON DECEMBER 28, 2023, I ARRIVED AT FCI SHERIDAN AND WAS MET BY SIS OFFICER THOMAS AND HE WAS TOLD THAT I TESTIFIED IN MULTIPLE CASES AND COOPERATED IN CASES OUT OF MONTANA IN HIGH PROFILE MURDER CASE AGAINST PRESTON ROSSBACH AND JOHNATHAN WITHWORTH IN A HIGH PROFILE MURDER CASE AND THERE WERE THREATS ON THIS GARD. HE FORCED ME TO GO TO THE UNIT AND SAID TO LET STAFF KNOW. WITHIN SIX HOURS I WAS THREATENED TO BE KILLED AND RAN UP ON SEVERAL TIME AND TOLD TO MEET PEOPLE IN THEIR HOUSES. MY LIFE WAS IN SERIOUS DANGER. THOMAS, SIS PHPP AND LT ROUGHTON WERE MADE AWARE AND ALL SENT THE FILE SENT WITH COOPERATION AGREEMENTS, IN MURDER CASES SENT BY THE JUDGE OUT OF MONTANA THAT SENTENCED 3 PEOPLE TO LIFE IN PRISON REQUESTING WITH SEC. I WROTE TO JUDGE AND THEY KNEW SIS BLOCK AT FPD SEATED RECEIVED THE SAME PACKET.

Claim II

AND DID NOTHING ABOUT IT.

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

IN JANUARY OF 2024 I WAS PLACED IN A CELL WITH A PREDATORY VIOLENT INMATE BY OFFICERS <sup>46</sup> HURATE & <sup>46</sup> CLAUDE

AT THE COMMAND OF LT. ROUGHAN TO HOUSE WITH AN ACTIVE GANG MEMBER OF THE PEOPLE OR GANG OUT OF MONTEANA THAT HAS PLACED AN \$80,000.00 HIT ON MY HEAD. THIS INMATE WAS CAUGHT WITH A SHOCK AND HAD DUE IN HIS CELL AND WAS FORCEFULLY RAPING ME. I COULD NOT HIT A PANIC BUTTON BECAUSE THERE IS NONE. I WAS SCARED FOR MY LIFE AND COULDN'T REPORT IT UNTIL I WAS CALLED OUT FOR AN ATTORNEY CALL ON TUESDAY 31ST, 2024. AFTER HE HAD RAPED ME WITH 6 TIMES.

### Claim III

State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.

SINCE ARRIVING AT FCI STERILAND I HAVE BEEN SEEING DR AGATA RUBIO NELSON MD & HAVE SEEN DR. GRASSLEY FOR A SERIOUS ANAL RECTAL ABSCESS & A GI BLEED THAT IS CAUSING ME TO BE SEVERELY ILL. 4 FOUR MONTHS I HAVE THIS WITH NO SPECIALIST. I HAVE 6 SPECIALIST I NEED TO SEE. GI specialist, ENT FOR NOSE & THROAT CANCER, cardiologist for A Heart problem, neurology for BRAIN STEM STROKES, urology for kidney stones & PROSTITITIS, Testicular TUMOR, SCANS, UTTER SOUND, UPPER GI, TRAUMATIC BRAIN INJURY, Lung nodules, seizure Disorder, Ulcerative colitis colitis, (If you have additional claims, describe them on another piece of paper, using the same outline.)

### CLAIM III EXTENSION

THE FACT THAT I HAVE SERIOUS ANAL RECTAL INFECTION. I NEED IMMEDIATE MEDICAL CARE. I AM VERY SICK. THE ABSCESS STARTED FROM BEING RAPED. THEY ARE AWARE OF THAT.

FEBRUARY OF 2024 I WAS LAYING ON THE FLOOR CRYING IN TEARS SCREAMING AND TOOK STAFF 3 HOURS TO TAKE ME TO THE HOSPITAL TO FIND THAT I HAD A KIDNEY STONE LOGED IN MY URETERS. THE HOSPITAL BELIEVED THAT A SERIOUS PAIN MANAGEMENT TREATMENT PLAN WAS NEEDED AND THE DR.'S AND NURSE HEIDT AND NURSE BURGAMAN LEFT ME LAYING ON THE FLOOR CRYING IN SEVERE PAIN FOR (S) HOURS TRYING TO PASS THE KIDNEY STONE. DURING THAT TIME WHILE STANDING ATTEMPTING TO PEE I FELL BACK MY HEAD AND HAD A SEIZURE AND INMATE CURTIS CLARICO GOT THE NURSE'S ATTENTION (NURSE POND) AND SHE LEFT ME ON THE FLOOR FOR CURTIS CLARICO TO ATTEND TO ME WHERE I COULD HAVE DIED WITH A CONVULSION. THE DR. AGALA RUBIO SEEN ME ON FEBRUARY THE 26TH, AND ADDED A SECOND SEIZURE MED. FOUR MONTHS HAVE PASSED AND JUST A SURGEON LOOKED AT THE ANAL RECTAL ABSCESS AND REQUESTED TWO MONTHS AGO AN EMERGENCY GI CONSULT.





## claim 4

on March 18 C/O Sheffington was at my door talking to my cell mate and called me a Faggot punk bitch in front of C/O Winkler & C/O Polosco where he admitted to leading my file and knew I was a transgender inmate. Neither of the officers reported this. I reported this to Administrator Carpenter and Captain J. Cerone along with 8 other inmates that wrote declarations or I asked to call them as witnesses in this case. The other officers just laughed. On several different occasions He (Sheffington) continued to call me and my transgender cell mate Faggot's for no apparent reason. That is absurd. He continued to sexually harass me & 4 other inmates reported it to J. Cerone. Officer Vasquez was present during these incidents and allowed this staff misconduct to continue without mandatory reporting.





claim 5

on December 28 2023 I transferred & I  
have a copy of the property sheet and the prison  
lost over \$2,000 in property. I have been in  
SHO for 4 months now. this is an issue on suit.



## Claim 6

I have been asking to get placed in the program for a Gender change. I am a Transgender Diagnosed with Gender Dysphoria And I had to beg staff to get clothing, Bras and panties, I am on Spironolactone with out Testosterone Due to recent CVA strokes And am being prevented from taking a Blood thinner Because of a serious GI Bleed. I am not getting the Gender conforming care that I need. They continued to house me with sexual predators until of recent. As well as staff member Poloscio offered me to "sock his Dick" on my return from the hospital from the kidney stone. This is an ongoing issue of mistreatment, staff misconduct and sexual harassment of transgender inmates like myself.



## Claim 7

CASE MANAGER JOHNSON REFUSES ME THE  
RIGHT TO EXHAUST FULLY BY REFUSING ME GRIEVANCES  
AND WAS AWARE OF THE PRIOR ISSUE IN SEA TAC  
WHERE STAFF ACCIDENTALLY CLASSIFIED ME AS A  
SEX OFFENDER AND MESSED UP MY CLASSIFICATION &  
IGNORE SERIOUS SAFETY & SECURITY ISSUES THAT  
COULD COST ME MY LIFE IN THE FED.

PEOPLE ARE GETTING MURDERED BECAUSE OF  
NEGLECT OR PURPOSEFUL ACTIONS BY BOP STAFF

[illegible]



#### IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

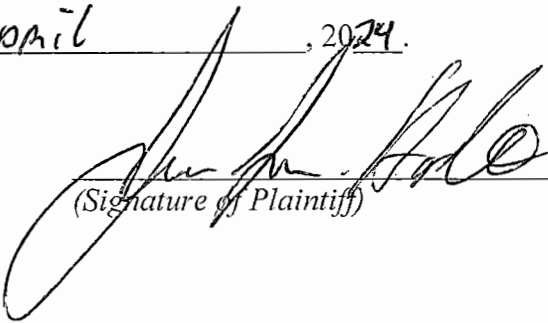
#### V. RELIEF

State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.

- A. ISSUE A DECLARATORY JUDGEMENT STATING THAT
- 1) THE PHYSICAL & SEXUAL ABUSE & HARASSMENT OF THE  
PLAINTIFF BY DEFENDANTS POLOSTIO, SKELINGTON, WINKLER & CASQUEZ  
VIOLATED THE PLAINTIFF RIGHTS UNDER THE EIGHT AMENDMENT DELIBERATE  
INDIFFERENCE, SEXUAL HARASSMENT, EQUAL PROTECTION CLAUSES
  - 2) DEFENDANT CAPTAIN D. CERONE FOR FAILURE TO TAKE ACTION TO  
CURE THE PHYSICAL ABUSE OF PRISONERS VIOLATE THE PLAINTIFF'S  
RIGHTS UNDER THE EIGHT AMENDMENT OF THE CONSTITUTION
  - 3) THE DEFENDANTS DR AGALA ROBIO, DR GRASSLEY - MEDICAL DIRECTOR,  
DIRECTOR OF NURSING SOLORZOGA, NURSE ACHT, NURSE BURGMAN, &  
NURSE POND, (SEE EXTENSION TO RELIEF ON THE BACK OF THIS PAGE.)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20th day of April, 2024.

  
(Signature of Plaintiff)

## Extension of Relief

Actors in Failing to provide Adequate Medical Care  
And continue to violate the plaintiff's rights under the  
Eight Amendment

B) ISSUE AN INJUNCTIVE Relief Ordering Defendants Dr.  
Ayala Rubio Nelson, Dr. Grassley or their Agents to:

1) Immediately Arrange for the plaintiff's need for serious  
specialist and Emergency consults to be moved to  
A Federal Medical Center

2) Before the plaintiff dies get serious medical treatment  
now

3) Carry out without anymore delay treatment directed by  
prior specialists.

C) Award compensatory Damages in the Following:

1) \$100,000.00 Jointly And severally Against Defendants  
Sheffington, Pond, Lt Roughton for physical &  
Emotional injuries

2) \$10,000 Joint And severally Against Defendants Hoerta,  
Blawen, Dr. Ayala Rubio Nelson for the punishment of Failing  
to protect me from sexual Assult And inadequate Medical  
Care, Delay in treatment.

3) \$50,000 Jointly And severally Against Defendants  
Ayala Rubio Nelson, Dr. Grassley, Medical Director Ramirez,



NURSE POND, NURSE HEIDT, NURSE BURGMAN for  
physical and emotional injury resulting from their  
failure to provide adequate medical care to the  
plaintiff.

4. 3,000 in property loss and damage

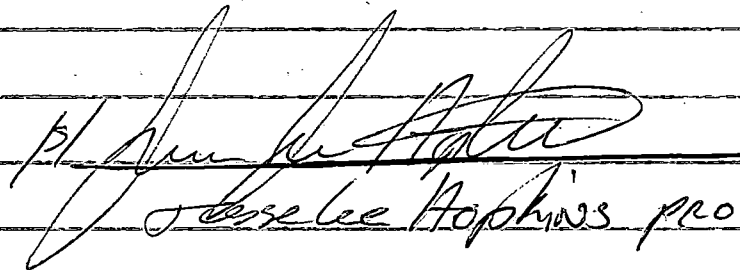
D. 1  
20,000

2. 20,000

3. 10,000

F. grant such other reliefs as it appears that the  
plaintiff is entitled.

DATED this 20th Day of April, 2024.

  
J. Lee Hopkins pro se

Jesse Lee Hopkins  
REG # 09849046  
Federal Correctional Institute  
P.O. Box 5000  
Sheridan, OR 97378



RDC 99



97204

SHERIDAN, OR 97378  
APR 24, 2024

\$0.00

R2305M143358-09



UNITED STATES DISTRICT COURT  
OFFICE OF THE CLERK  
District of Oregon  
740 UNITED STATES COURTHOUSE  
1000 S.W. THIRD AVENUE  
PORTLAND, OREGON

97204-2902

